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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)
Chapter 11
(Jointly Administered)

**DECLARATION OF THOMAS G.
HOFFMAN, JR. IN SUPPORT OF
SECURITIES PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION**

Date: March 11, 2025
Time: 10:00 a.m.
Before: Hon. Dennis J. Montali

Objection Deadline: February 6, 2025

1 I, THOMAS G. HOFFMAN, JR., declare as follows:

2 1. I am a partner of the law firm of Labaton Keller Sucharow LLP. I am submitting this
3 declaration in support of the Securities Plaintiffs' Motion for Class Certification.

4 2. Attached hereto as Exhibit A is a true and correct copy of the Expert Report of Chad
5 Coffman, CFA.

6 3. Attached hereto as Exhibit B is a true and correct copy of the Declaration of Greg
7 Trujillo (on behalf of the Public Employees Retirement System of New Mexico).

8 4. Attached hereto as Exhibit C is a true and correct copy of the Declaration of City of
9 Warren Police and Fire Retirement System.

10 5. Attached hereto as Exhibit D is a true and correct copy of the Declaration of York
11 County on Behalf of the County of York Retirement Fund.

12 6. Attached hereto as Exhibit E is a true and correct copy of the Declaration of Mid-
13 Jersey Trucking Industry & Local 701 Pension Fund.

14 7. Attached hereto as Exhibit F is a true and correct copy of the firm resume of Labaton
15 Keller Sucharow LLP.

16 8. Attached hereto as Exhibit G is a true and correct copy of the firm resume of
17 Robbins Geller Rudman & Dowd LLP.

18 9. Attached hereto as Exhibit H is a true and correct copy of the firm resume of
19 Lowenstein Sandler LLP, Bankruptcy and Restructuring Department.

20 10. Attached hereto as Exhibit I is a true and correct copy of the firm resume of
21 Michelson Law Group.

22 I declare under penalty of perjury that the foregoing is true and correct. Executed this
23 23rd day of December, 2024.

24
25 /s/ Thomas G. Hoffman, Jr.
Thomas G. Hoffman, Jr.

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28 DECLARATION OF THOMAS G. HOFFMAN, JR. IN SUPPORT OF SECURITIES PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION

[CASE NO. 19-30088 (DM) (LEAD CASE)]